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December 17, 2002

DEC 1 9 2002

FCC - MAILROOM

Ms. Marlene H. Dortch, Secretary Federal Communications Commission The Portals/445 Twelfth Street, S.W. Washington, D.C. 20554 VIA UPS OVERNIGHT

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14.25

RE: Comments to Petition for Rulemaking

Dear Ms. Dorrch:

There is transmitted herewith on behalf of Two Ocean Broadcasting Company ("Two Ocean"), the permittee of Station KJWY-DT, Jackson, Wyoming, an original and four copies of its *Comments* regarding the *Petition for Rulemaking* to amend §73.622(b), the DTV Table of Allocations, by substituting Channel 4 as KJWY's paired DTV allocation for the transition period in lieu of Channel 14 as originally allocated.

An extra copy of this transmittal letter is enclosed, as well as a pre-addressed, stamped envelope. Please confirm your receipt of the filing of these *Comments* by date stamping the extra copy of this transmittal letter and returning it to the undersigned counsel.

Should additional information be desired concerning these *Comments* please contact the undersigned counsel.

Respectfully submitted,

Two Ocean Broadcasting Company

J. Dominic Monahan, Its Counsel

JDM/nlk

cc: Ralph Toddre (w/enclosure)

Bill Fouch (w/enclosure)
Frank Haynes (w/enclosure)

Mari Beth Bindues (w/enclosure)

No int Conses rec'd

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

RECEIVED & INSPECTED

DEC 1 9 2002

FCC - MAILROOM

| n the Matter of |) | |
|--|---|----------------------------------|
| Amendment of Section 73.622(b) Table of Allotments, |) | MM Docket No. 02-375 RM-10606 |
| Digital Television Broadcast Stations (Jackson, Wyoming) | j | |

COMMENTS

Two Ocean Broadcasting Company ("Two Ocean"), the permittee of Station KJWY-DT, Jackson, Wyoming, by its counsel, and in accordance with 47 CFR §§1.415 and I.420, hereby submits its Comments in the above-captioned proceeding. In support thereof, Two Ocean states as follows:

At the request of Two Ocean, the Federal Communications Commission ("FCC") issued a *Notice of Proposed Rule Making* (DA 02-3380, released December 13, 2002) ("NPRM") in the above-captioned proceeding proposing to substitute Channel 4 as the station's paired DTV allocation' in lieu of Channel 14 in Jackson, Wyoming as originally allocated. The proposed substitution would permit Station KJWY to operate at its current antenna location at substantially reduced operating costs, provide a paired VHF DTV channel, and improve reception for DTV within the KJWY-DT service.

Station KJWY(TV) conducts its current analog operation on Channel 2

For reasons set forth in Two Ocean's original *Petition for Rule Making* as well as the above-referenced *NPRM*, Two Ocean fully supports the substitution of DTV Channel 4 lor DTV Channel 34.

In the event the FCC assigns DTV Channel 4 to Jackson, Wyoming, Two Ocean will apply for a construction permit and will go forward with construction of the new DTV facilities on DTV Channel 4 at the coordinates set forth on the notice.

In view of the reasons set forth above, Two Ocean supports rhe proposal contained in the *NPRM* and respectfully requests that the Commission go forward with the allocation of DTV Channel 4 in substitution of DTV Channel 14 in Jackson, Wyoming.

DATED this 17th day of December, 2002.

Respectfully submitted,

Two Ocean Broadcasting CC 1F TY

J. Dominic Monahan, Its Counse.